

# EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KEVIN FOOTE (aka Kevin Kelly),  
Individually and on behalf of all others  
similarly situated;

BRANDON TATE, Individually and  
on behalf of all others similarly  
situated; and

BRENT TATE, Individually and on  
behalf of all others similarly situated;

Plaintiffs,

v.

ALL ELITE WRESTLING, LLC;

IAN RICCABONI; and

TONY KHAN;

Defendants.

Civil Action No. \_\_\_\_\_

**NOTICE OF COMPLIANCE WITH 28 U.S.C. § 1446(d)**

To: Kate Barkman, Clerk of Court  
U.S. District Court for the Eastern District of Pennsylvania  
2609 U.S. Courthouse  
601 Market Street  
Philadelphia, Pennsylvania 19106-1797

Benjamin J. Baer, Esquire  
[bbaer@injurylawpartners.com](mailto:bbaer@injurylawpartners.com)  
**INJURY LAW PARTNERS**  
1628 JFK Blvd, Suite 1302

Philadelphia, PA 19103  
215-402-2442

Stephen P. New, Esquire  
[steve@newLawoffice.com](mailto:steve@newlawoffice.com)  
**STEPHEN NEW & ASSOCIATES**  
430 Harper Park Dr.  
Beckley, WV 25801  
304-250-6017

**PLEASE TAKE NOTICE** that on October 4, 2024, the Notice of Filing of Notice and Petition for Removal, attached hereto as **Exhibit 1**, was filed with the Prothonotary of the Philadelphia County Court of Common Pleas.

Respectfully submitted,

**JACKSON LEWIS P.C.**

Dated: October 4, 2024

By: /s/ Daniel F. Thornton  
Daniel F. Thornton (PA No. 318431)  
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*Counsel for Defendants*

\* *pro hac vice* forthcoming

# EXHIBIT 1

**JACKSON LEWIS P.C.**

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*ATTORNEYS FOR DEFENDANTS*

KEVIN FOOTE (aka Kevin Kelly),  
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similarly situated;

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Plaintiffs,

v.

ALL ELITE WRESTLING, LLC;

IAN RICCABONI; and

TONY KHAN;

Defendants.

IN THE COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY

Docket No.: 240900115

**NOTICE OF FILING OF NOTICE AND PETITION FOR REMOVAL**

To: Clerk of Court  
Court of Common Pleas, Philadelphia County  
1301 Filbert Street  
Suite 310 B  
Philadelphia, Pennsylvania 19107

Benjamin J. Baer, Esquire  
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Beckley, WV 25801  
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**PLEASE TAKE NOTICE** that on October 4, 2024, Defendants All Elite Wrestling, LLC, Ian Riccaboni and Tony Khan (“Defendants”) electronically filed a Notice and Petition for Removal of this action with the U.S. District Court for the Eastern District of Pennsylvania with that Court.

**PLEASE TAKE FURTHER NOTICE** that in accordance with 28 U.S.C. § 1446, Defendants are submitting a true and correct copy of that Notice and Petition for Removal, which is attached hereto as **Exhibit A**, for filing with the Philadelphia County Court of Common Pleas.

Respectfully submitted,

**JACKSON LEWIS P.C.**

Dated: October 4, 2024

By: /s/ Daniel F. Thornton  
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IN THE COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY

Docket No.: 240900115

**CERTIFICATION OF SERVICE**

I hereby certify that true and correct copies of Defendants' Notice of Filing of Notice and Petition for Removal and this Certification of Service were served on this 4<sup>th</sup> day of October, 2024, via the Court's ECF system and electronic mail upon the following counsel of record:

Benjamin J. Baer, Esquire  
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Respectfully submitted,

**JACKSON LEWIS, P.C.**

/s/ Daniel F. Thornton

Daniel F. Thornton (PA No. 318431)

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